

Office of Air and Radiation Time and Attendance Practices Audit Discussion
September 3, 2019

Objective: Discuss and finalize OCFO's response to the draft report on the OIG Audit, "Outdated EPA Leave Policy and Control Weaknesses Caused Irregularities in Office of Air and Radiation's Timekeeping Practices" (OIG Project No. OA-FY17-0090).

Background

- OIG issued a project notification and began preliminary research on OAR's timekeeping practices in December 2016.
- Objective of the audit was to identify and analyze risks in the Office of Air and Radiation's timekeeping practices and was conducted to address concerns identified in a prior audit and investigations about time and attendance irregularities within OAR.
- During audit, OIG spoke with key officials from the OAR, OCFO and OAS/OHR to identify the processes and procedures in place for attesting and approving time attendance data and determine whether EPA's leave policy complies with applicable regulations.
- OIG sent the draft report resulting from the audit on August 7.
- Each office will submit separate responses.

OIG Findings

- Leave entitlements under FMLA are not formalized in the agency's leave policy contained in the *Leave Manual*.
- OAR staff made 16 prior period adjustments in 2016 that resulted in salary overpayments because the EPA has limited controls in place to preclude employees from modifying previously attested and approved time and attendance records and EPA policy lacks specificity in terms of time frames for prior period adjustments.
 - EPA's RMDS No. 2540-08-P1, *Payroll Time and Attendance Reporting*, states that corrections are to be made in a timely manner.
- OAR staff received unallowable travel compensatory time off (TCTO) in fiscal year 2016 because requests were not submitted and approved within required time frames established in EPA's *Pay Administration Manual*.

OIG Recommendations

1. Update the Leave Manual to reflect laws and regulations implemented since 1995 pertaining to leave taken under the Family and Medical Leave Act and update the Leave Handbook to be consistent with the manual. (*Assigned to OMS*)
2. Develop a process and establish time frames to review and update the *Leave Manual* and *Leave Handbook* to incorporate new laws and regulations on a regular basis. (*Assigned to OMS*)
3. **Implement a policy that defines time frames for time and attendance adjustments and implement controls in PeoplePlus to prevent adjustments, without prior approval to make changes, after the established time frames.**
4. Implement controls to enforce compliance with the requirements associated with requesting and approving Travel Compensatory Time Off, including established time frames. (*Assigned to OAR*)
5. Evaluate and determine whether the improperly credited Travel Compensatory Time Off should have been forfeited as required by the EPA's *Pay Administration Manual* and, if so, whether the time off or value of any time off used should be recovered. (*Assigned to OMS*)

OCFO Response

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Next Steps

- September 6: Written comments due to OIG (extension from Aug 16 was requested and granted).
- Week of September 9: OIG will schedule meeting to discuss agency comments regarding the draft report.